THOMAS E. WINNER 1 Nevada Bar No. 5168 2 RUSSELL D. COLLINGS ATKIN WINNER & SHERROD 1117 South Rancho Drive 3 Las Vegas, Nevada 89102 Phone (702) 243-7000 4 Facsimile (702) 243-7059 5 Attorneys for Defendant

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

STEPHANIE YOUNGBLOOD,

Plaintiff,

VS.

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STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY; STATE FARM FIRE AND CASUALTY COMPANY: and DOES I through X, inclusive,

Defendants.

CASE NO.: 2:14-cv-00590-JAD-PAL DEPT. NO.:

JOINT STIPULATION AND [PROPOSED] **ORDER CONTINUING** DEADLINE TO FILE PRE-TRIAL MOTIONS AND TRIAL DATE

COMES NOW Plaintiff Stephanie Youngblood, by and through her attorney of record Elizabeth J. Foley, Esq. of the law firm of Elizabeth Foley Lawyer, Ltd., and Defendant State Farm Fire and Casualty Company, constituting all the parties appearing in this action, and hereby stipulate to continue the deadline to file Pre-Trial Motions from March 27, 2015 to May 22, **2015** and to continue Trial from April 28, 2015 to **June 23, 2015**.

Reason For Continuance. The parties to this action have been engulfed in extensive discovery efforts and have now completed all discovery in this case. After completing discovery and engaging in lengthy discussions the parties have agreed to mediate this case with the Honorable Jackie Glass (ret.) on April 17, 2015. At this time the parties desire to save the costs and time of expensive motion practice and attempt to resolve this case through Mediation, and therefore request the above extension. The parties are informed that the Court is currently available on the dates to which they parties Stipulate.

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Now, therefore, IT IS HEREBY STIPULATED by and between all the parties to this action as follows:

- 1. That the deadline to file Pre-Trial Motions, currently set for March 27, 2015, be continued to May 22, 2015; and
- 2. That Trial in this action, currently set for April 28, 2015, be continued to **June 23**, **2015**.

## SO STIPULATED:

DATED this 24 day of March, 2015.

ELIZABETH FOLEY LAWYER LTD.

ATKIN WINNER & SHERROD

ELIZABETH A FOLEY
Nevada Bar No. 1509
ELIZABETH FOLEY LAWYER LTD.
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Las Vegas, NV 89106 Attorneys for Plaintiff Nevada Bar No. 5168
RUSSELL D. COLLINGS
Nevada Bar No. 11363
ATKIN WINNER & SHERROD

1117 South Rancho Drive Las Vegas, Nevada 89102 Attorneys for Defendants

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Based on the Joint Stipulation of the parties, and good cause appearing therefor, **IT IS ORDERED** that the deadline for Pre-Trial Motions currently set for March 27, 2015 be and hereby is continued to May 22, 2015. **IT IS FURTHER ORDERED** that trial in this action, currently set for April 28, 2015 be and hereby is continued to July 14, 2015, at 9:00 a.m., which is the Court's first available trial stack after June 23, 2015.

IT IS SO ORDERED.

DATED this 24th day of March, 2015.

U.S. DISTRICT COURT JUDG

Submitted by:

ATKIN WINNER & SHERROD, LTD.

Thomas E. Winner Nevada Bar No. 5168 Russell D. Collings Nevada Bar No. 11363 1117 South Rancho Drive Las Vegas, Nevada 89102 Attorneys for Defendants

Case No.: 2:14-cv-00590-JAD-PAL

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